

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Leonard Gamble, Jr.	:	Chapter 13
	:	Case No.: 25-10823-amc
Debtor	:	

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**MOTION TO APPOINT DEBTOR’S DAUGHTER LYNN D. GAMBLE**  
**AS NEXT FRIEND PURSUANT TO BANKRUPTCY**  
**RULE 1004.1 AND 11 U.S.C. 105(a)**

Debtor, by his attorney, Brad J. Sadek, respectfully moves this Honorable Court for an Order appointing the debtor’s daughter, Lynn D. Gamble, as a Next Friend for Leonard Gamble, Jr., and in support of this motion alleges as follows:

1. Debtor, Leonard Gamble, Jr., filed the above-captioned petition on February 28, 2025.
2. The debtor suffers from the following medical conditions, as indicated on the Medical Certificate provided by Dr. Roberta Lee-Powell. See Exhibit “A”:
  - (a) Status Post CVA
  - (b) Aphasia, as a result of his Stroke and is unable to speak,
  - (c) Chronic Kidney Disease
  - (d) Hypertension, and
  - (e) Hyperlipidemia
3. The debtor relies on his daughter, Lynn D. Gamble, to make financial decisions on his behalf due to the nature of his illness.
4. The debtor’s case has been filed in complete good faith.
5. The debtor’s daughter, Lynn D. Gamble, was present for the preparation of schedules and filing of the Chapter 13 Bankruptcy.
6. Lynn D. Gamble has completed and signed an Acknowledgment of Bankruptcy Representative. See Exhibit B.

7. Furthermore, Lenoard Gamble, J. has signed a document dated November 9, 2021, appointing Lynn D. Gamble as his Power of Attorney. See Exhibit C, a true and correct copy of the Power of Attorney attached hereto and incorporated herein as if set forth in full.
8. Based on the foregoing, the Debtor should be excused from the credit counseling course and debtor education course requirement under 11 U.S.C. § 109(h).
9. The interest of all parties involved in this case are best served if the Debtor's daughter, Lynn D. Gamble, is permitted to appear at the 341(a) Meeting of Creditors on behalf of the Debtor.

**WHEREFORE** Debtor respectfully requests this Honorable Court to approve the Motion to Appoint Daughter, Lynn D. Gamble as a Next Friend pursuant to Bankruptcy Rule 1004.1 and 11 U.S.C. 105(a).

Date: February 28, 2025

/s/ BRAD J. SADEK  
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